

92 RF67D6

EG&G ROCKY FLATS

EG&G ROCKY FLATS, INC.
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June 15, 1992

92-RF-6706

Terry A. Vaeth
Manager
DOE, RFO

Attn: T. E. Lukow, F. R. Lockhart

INSTALLATION OF SEDIMENT SAMPLERS - JEE-0431-92

As you know, storm water monitoring is an obligatory component of the NPDES permit program, and is important to water quality issues at Rocky Flats Plant. Storm water monitoring was initiated in 1990, and was recently expanded to meet requirements of the Environmental Protection Agency (EPA). Since the start of monitoring, an important component of the program was the inclusion of sampling runoff for sediments. The installation of sediment sampling equipment required special consideration because of wetlands impacts. DOE recently notified EG&G Rocky Flats that the requirements of the Floodplain/Wetland Assessment regulations had been met, and "compliance with the regulations at 10 CFR 1022 is now complete for that project" [DOE Memorandum (5480) dated May 15, 1992, copy attached].

The subcontractor has been authorized to proceed with the installation of sediment samplers based on DOE approval. Subsequent to notifying the subcontractor that work may proceed on the installation of sediment samplers, DOE Environmental Restoration Division cited Migratory Bird Treaty Act (MBTA) and Threatened and Endangered Species Act (TESA) issues to put this activity "on hold" (copy attached). We believe that the installation of sediment samplers presents no issues relating to either the MBTA or the TESA. It should be noted that during the comment period required by 10 CFR 1022, no comments were received relating to this project. We are requesting formal written confirmation that no issues remain with respect to the installation of sediment samplers.

Data on sediment quantity and quality will provide valuable information regarding storm water quality, and should be considered if numeric limitations are placed at storm water monitoring points, or in the event stream standards are adopted for Segment 5 of Big Dry Creek, which includes the waters on Rocky Flats Plant. Further delay in placement of the storm water sediment samplers would preclude collecting any information for either the upcoming NPDES permit application package or deliberations of stream standards by the Colorado Water Quality Control Commission, now scheduled for October, 1992. In both cases, sediment data could be crucial to future RFP compliance with water quality standards. Please note, however, that sediment sampling is not currently required by NPDES regulations, nor does the storm

CLASSIFICATION:

CONFIDENTIAL		
DECLASSIFIED	X	X
CONFIDENTIAL		
SECRET		

HORIZED CLASSIFIER
SIGNATURE (initials)

SIGNATURE M. P. [illegible] (U)BU
-15-92

Figure 1

REPLY TO RFP CC NO:

ION ITEM STATUS

☒ CLOSED

PARTIAL
APPROVALS:

24
25 TYPYST INITIALS

5-10

105 (Nov. 25, 1952)

REVIEWED FOR CLASSIFICATION/UCNI

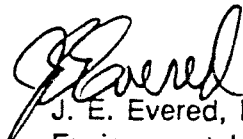
By E. M. Nelson

Date 2-25-42

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water discharge permit application ask for data generated by sediment sampling procedures. The main impact of delay will be loss of data from the 1992 water year, and, perhaps, contractual ramifications if the delay extends beyond the current subcontract performance period.


J. E. Evered, Director
Environmental Management
EG&G Rocky Flats, Inc.

REF:fm

Orig. and 1 cc - T. A. Vaeth

Attachments:
As stated